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10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
12 SOUTHERN DIVISION

13

14 STEVEN RUPP, et al.,

15 Plaintiffs,

16 v.

17 XAVIER BECERRA, in his official  
18 capacity as Attorney General of the  
19 State of California, et al.,

20 Defendants.

21 8:17-cv-00746-JLS-JDE

22

23 **DECLARATION OF PETER H.  
24 CHANG IN SUPPORT OF  
25 DEFENDANT'S MOTION FOR  
26 SUMMARY JUDGMENT**

27 Date: May 31, 2019  
Time: 10:30 a.m.  
Courtroom: 10A  
Judge: Hon. Josephine L. Staton  
Trial Date: N/A  
Action Filed: April 24, 2017

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1 I, Peter H. Chang, hereby declare and state the following:

2 1. I am a Deputy Attorney General at the California Department of Justice  
3 and serve as counsel to Attorney General Xavier Becerra in the above-titled matter.

4 2. I made this declaration in support of Defendant's Motion for Summary  
5 Judgement. Unless otherwise stated, I have personal knowledge of the facts set  
6 forth herein and am competent to testify thereto.

7 3. Attached are true and accurate copies of the following exhibits:

8 <b>Exhibit 9 Number</b>	10 <b>Document Description</b>	11 <b>Page 12 Number</b>
10 1	11 Expert Report and Declaration of John Donohue (Donohue Rpt.)	12 1-117
10 2	11 Expert Report and Declaration of Blake Graham (Graham Rpt.)	12 118-132
10 3	11 Expert Report and Declaration of Michael Mersereau (Mersereau Rpt.)	12 133-143
10 4	11 Expert Report and Declaration of Christopher Colwell (Colwell Rpt.)	12 144-192
10 5	11 Expert Report and Declaration of Lucy Allen (Allen Rpt.)	12 193-231
10 6	11 Updated Table and Appendix B to Expert Report of Lucy Allen (Exhibit 80 to Lucy Allen Deposition)	12 232-244
10 7	11 Rebuttal Expert Report and Declaration of John Donohue	12 245-254
10 8	11 Rebuttal Expert Report and Declaration of Blake Graham	12 255-262
10 9	11 Excerpts of Transcript of the Deposition of John Donohue	12 263-289
10 10	11 Excerpts of Transcript of the Deposition of Blake Graham	12 290-341
10 11	11 Excerpts of Transcript of the Deposition of Michael Mersereau	12 342-393
10 12	11 Excerpts of Transcript of the Deposition of Christopher Colwell	12 394-435
10 13	11 Excerpts of Transcript of the Deposition of Lucy Allen (Allen Dep.)	12 436-471
10 14	11 Excerpts of Transcript of the Deposition of J. Buford Boone (Boone Dep.)	12 472-583
10 15	11 Excerpts of Transcript of the Deposition of Gary Kleck (Kleck Dep.)	12 584-730
10 16	11 Excerpts of Transcript of the Deposition of Stephen Helsley (Helsley Dep.)	12 731-877

1	Exhibit Number	Document Description	Page Number
2	17	Violence Policy Center, <i>Bullet Buttons: The Gun Industry's Attack on California's Assault Weapons Ban</i> (2012)	878-888
3	18	Defendant's Second Supplemental Response to Plaintiff Troy Willis's First Set of Interrogatories	889-905
4	19	Excerpt of United States Army, <i>Rifle Marksmanship M16/M4 - Series Weapons</i> (2008)	906-926
5	20	Brady Center to Prevent Gun Violence, <i>Assault Weapons "Mass Produced Mayhem"</i> (2008)	927-989
6	21	Excerpts of Bureau of Alcohol, Tobacco, and Firearms, <i>Department of the Treasury Study on the Sporting Suitability of Modified Semiautomatic Assault Rifles</i> (1998)	990-1042
7	22	Bureau of Alcohol, Tobacco, and Firearms, <i>Report and Recommendation on the Importability of Certain Semiautomatic Rifles</i> (1989) (ATF Rpt.)	1043-1061
8	23	Christopher S. Koper, et al., <i>Criminal Use of Assault Weapons and High-Capacity Semiautomatic Firearms: an Updated Examination of Local and National Sources</i> , 95 Journal of Urban Health 3, 313-321 (2017) (Koper Article)	1062-1070
9	24	Colt.com, AR15A4 Advertisement	1071-1071
10	25	Colt.com, About Colt Rifles	1072-1073
11	26	David S. Fallis, <i>Data Indicate Drop in High-Capacity Magazines During Federal Gun Ban</i> , Washington Post (Jan. 10, 2013)	1074-1077
12	27	H.R. Rep. No. 103-489, Public Safety and Recreational Firearms Use Protection Act (H.R. Rep. 103-489)	1078-1123
13	28	Mark Follman, et al., <i>More than Half of Mass Shooters Used Assault Weapons and High-Capacity Magazines</i> , Mother Jones (Feb. 27, 2013)	1124-1127
14	29	S.B. 880 Report, 2015-2016 Reg. Sess., Assembly Committee on Public Safety (June 14, 2016) (S.B. 880 Rpt.)	1128-1138
15	30	U.S. Department of Justice, Office of Justice Programs, National Institute of Justice, <i>Selection and Application Guide 0101.06 to Ballistic-Resistant Body Armor</i> (2014)	1139-1242
16	31	Violence Policy Center, <i>"Officer Down": Assault Weapons and the War on Law Enforcement</i> (2003)	1243-1271
17	32	Violence Policy Center, <i>The Militarization of the U.S. Civilian Firearms Market</i> (2011)	1272-1324

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Exhibit Number	Document Description	Page Number
	33	Violence Policy Center, <i>Firearm Justifiable Homicides and Non-Fatal Self-Defense Gun Use: An Analysis of Federal Bureau of Investigation and National Crime Victimization Survey Data</i> (2018)	1325-1342
	34	California Senate Bill 23, 1999 Cal. Stat. ch. 129 (S.B. 23)	1343-1456
	35	Guns & Ammo: The New Breed of Assault Rifle, <i>Tomorrow's State-of-the-Art Sporting Rifle</i> (July 1981) (July 1981 Guns & Ammo)	1457-1469
	36	Damien Cave and Charlotte Graham-McLay, <i>New Zealand to Ban Military-Style Semiautomatic Guns, Jacinda Arden Says</i> , New York Times (March 20, 2019)	1470-1490
	37	Kaylee Hartung, et al., <i>Soneman Douglas shooting. Now parents are urged to be alert</i> , CNN (March 25, 2019)	1491-1502
	38	Panagiotis K. Stefanopoulos, et al., <i>Gunshot wounds: A review of ballistics related to penetrating trauma</i> , Journal of Acute Disease, 178-185 (2014)	1503-1510
	39	United States Census Bureau, <i>Quick Facts: California</i> (available at <a href="https://www.census.gov/quickfacts/ca">https://www.census.gov/quickfacts/ca</a> )	1511-1515
	40	Law Center to Percent Gun Violence, <i>The California Model: Twenty Years of Putting Safety First</i>	1516-1523
	41	U.S. DOJ Press Release, <i>California Man Charged with Conspiring to Provide Material Support to Terrorism and Being 'Straw Purchaser' of Assault Rifles Ultimately Used in San Bernardino, California, Attack</i> (Dec. 17, 2015)	1524-1526
	42	Excerpt of National Shooting Sports Foundation, <i>NSSF Report: Modern Sporting Rifle (MSR) Comprehensive Consumer Report</i> (2013)	1527-1535
	43	Excerpt of National Shooting Sports Foundation, <i>NSSF Report 2017 Edition: Firearms Retailer Survey Report, Trend Data 2008-2016</i> (2017)	1536-1537
	44	FBI Training Division: FBI Academy, Quantico, VA, <i>Executive Summary of Justification for Law Enforcement Partners</i> (May 6, 2014)	1538-1543
	45	Violence Policy Center, <i>Key Points About Assault Weapons</i>	1544-1544

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

1 Executed on March 25, 2019, at San Francisco, California.  
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5 /s/ Peter H. Chang  
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101 Peter H. Chang  
102 Deputy Attorney General